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March 3, 2022

VIA ECF

The Honorable Lorna G. Schofield
United States District Court
Southern District of New York
500 Pearl Street
New York, N.Y. 10007

Dated: March 9, 2022
New York, New York

Re: *United States v. Norman Gray, 21 CR 713 (LGS)*



LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Dear Judge Schofield:

I represent Norman Gray in the above-captioned case. I write to request an adjournment of the pretrial motion deadline, which is currently set for March 25, 2022. The government consents to this request.

As the government noted in the joint status update filed on Monday, discovery is ongoing and there are multiple outstanding requests. This includes discovery from Mr. Gray's company, which may be a significant source of documents in the case. Because the discovery is voluminous and ongoing, I request a sixty-day adjournment to ensure that I have adequate time to determine whether or not a basis exists for any pretrial motions. This is the first request for an extension of time. The parties have conferred and do not expect that such an adjournment will impact any trial schedule in this case.

Accordingly, I respectfully request that the deadline for pretrial motions be adjourned to May 24, 2022, with government responses due June 14th, and the defendant's reply due June 24th. The parties are available for a status conference on June 27th, June 28th, and June 29th, or on a date that is convenient for the Court.

Hon. Lorna G. Schofield

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Thank you very much for your consideration of this request.

Respectfully submitted,

/s/ Megan Wall-Wolff
Megan Wall-Wolff

Attorney for Norman Gray

CC: AUSA Ben Gianforti
AUSA Tara LaMorte